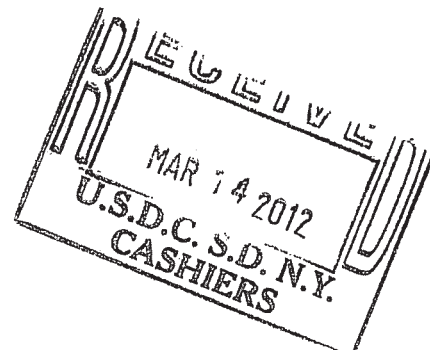


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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



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UNITED STATES OF AMERICA,	:	<u>VERIFIED COMPLAINT</u>
Plaintiff,	:	12 Civ.
- v -	:	
\$500,392,977.00 IN U.S. CURRENCY,	:	
Defendant-in-Rem.	:	

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Plaintiff United States of America, by its attorney,  
PREET BHARARA, United States Attorney for the Southern District  
of New York, for its complaint alleges, upon information and  
belief, as follows:

I. JURISDICTION AND VENUE

1. This action is brought by the United States of  
America pursuant to 18 U.S.C. § 981(a)(1)(C), seeking the  
forfeiture of \$500,392,977.00 in U.S. Currency (the "Defendant in  
Rem").

2. This Court has jurisdiction over this action  
pursuant to 28 U.S.C. §§ 1345 and 1355.

3. Venue is proper pursuant to 28 U.S.C. § 1355 because acts and omissions giving rise to the forfeiture occurred in the Southern District of New York.

## II. BASIS FOR FORFEITURE

4. During the period between approximately 2003 and 2010, through the conduct of certain employees of Science Applications International Corporation ("SAIC"), SAIC, a U.S. corporation with its headquarters in McLean, Virginia, defrauded the City of New York into significantly overpaying for the CityTime information technology project ("CityTime").

5. On or about March 14, 2012, SAIC entered into a deferred prosecution agreement with the United States regarding its participation in the CityTime fraud described in this verified complaint. SAIC has agreed that it will forfeit pursuant to 18 U.S.C. § 981(a)(1)(C) a total of \$500,392,977.00, which represents proceeds it received from the City during the course of the fraud. Pursuant to the deferred prosecution agreement, SAIC will transfer \$500,392,977.00 in U.S. Currency to the United States Marshals Service. These funds constitute the Defendant-In-Rem.

## III. CLAIM FOR FORFEITURE

6. Plaintiff repeats, realleges and incorporates by reference herein each and every allegation contained in paragraphs one through five of this Verified Complaint.

7. Pursuant to 18 U.S.C. § 981(a)(1)(C), "[a]ny property, real or personal, which constitutes or is derived from proceeds traceable to . . . any offense constituting 'specified unlawful activity' (as defined in Section 1956(c)(7) of [title 18]), or a conspiracy to commit such offense," is subject to forfeiture to the United States.

8. "Specified unlawful activity" is defined in 18 U.S.C. § 1956(c)(7), and the term includes any offense listed under 18 U.S.C. § 1961(1). Section 1961(1) lists, among other offenses, violations of 18 U.S.C. § 1343 (relating to wire fraud).

9. The Defendant in Rem is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) because there is probable cause to believe that it represents proceeds traceable to offenses constituting specified unlawful activity, to wit, wire fraud, in violation of 18 U.S.C. § 1343.

10. By reason of the foregoing, the Defendant in Rem became and is subject to forfeiture to the United States of America, pursuant to 18 U.S.C. §§ 981(a)(1)(C).


WHEREFORE, Plaintiff United States of America prays that process issue to enforce the forfeiture of the Defendant in Rem and that all persons having an interest in the Defendant in Rem be required to appear and show cause why the forfeiture of the Defendant in Rem should not be decreed, that this Court

decree forfeiture of the Defendant in Rem to the United States of America for disposition according to law, and that this Court grant plaintiff such further relief as it may deem just and proper, together with the costs and disbursements of this action.

Dated: New York, New York  
March 14, 2012

PREET BHARARA  
United States Attorney for the  
Southern District of New York  
Attorney for the Plaintiff  
United States of America

By:

  
\_\_\_\_\_  
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VERIFICATION

STATE OF NEW YORK                    )  
COUNTY OF NEW YORK                )  
SOUTHERN DISTRICT OF NEW YORK )

Robert Ryan, being duly sworn, deposes and says that he is a Criminal Investigator with the United States Attorney's Office for the Southern District of New York and as such has responsibility for the within action; that he has read the foregoing Verified Complaint and knows the contents thereof, and that the same is true to the best of his own knowledge, information and belief.

The sources of deponent's information and the ground of his belief are conversations with other law enforcement officers and others, official records and files of the New York City Department of Investigation, and the United States Government, and information obtained directly by deponent during an investigation of alleged violations of Title 18, United States Code.

*Robert B*

ROBERT RYAN  
Criminal Investigator  
USAO - SDNY

Sworn to before me this  
13<sup>th</sup> day of March, 2012:

*Ma. O. Silva*  
\_\_\_\_\_  
NOTARY PUBLIC

MARCO DASILVA  
Notary Public, State of New York  
No. 01DA6145603  
Qualified in Nassau County  
My Commission Expires May 13, 2014